

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO. <u>1:24-365</u>
)	18 U.S.C. § 641
v.)	18 U.S.C. § 981(a)(1)(C)
)	28 U.S.C. § 2461(c)
)	
CYNTHIA DELORES HOLLAND)	INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

From in or around April 2016, through in or around November 2022, in the District of South Carolina, Defendant CYNTHIA DELORES HOLLAND, did knowingly and willfully embezzle, steal, purloin, and convert to her own use and the use of another, more than \$1,000 of money and a thing of value of the United States and the Social Security Administration, a department and agency of the United States, with the intent to deprive the United States and the Social Security Administration of the use and benefit of the money and thing of value;

In violation of Title 18, United States Code, Section 641.

FORFEITURE

THEFT OF PUBLIC MONEY:

Upon conviction for violation of Title 18, United States Code, Section 641 as charged in this Indictment, the Defendant, CYNTHIA DELORES HOLLAND, shall forfeit to the United States any property, real or personal, constituting, derived from, or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offense.

PROPERTY:

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the violation charged in this Indictment includes, but is not limited to, the following:

Cash Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendant obtained directly or indirectly from the offense charged in the Indictment, that is, a minimum of approximately \$62,664.30 in United States currency, and all interest and proceeds traceable thereto for her violation of 18 U.S.C. § 641.

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), [incorporating Title 21, United States Code, Section 853(p)], to seek forfeiture of any other property of the said Defendant up to the value of the above forfeitable property.

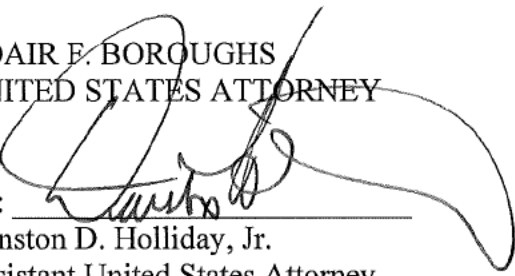
Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

[REDACTED]

FOREPERSON

ADAIR E. BOROUGHS
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